TICKMILL
SOUTH AFRICA

PAIA MANUAL

October 2026

TABLE OF CONTENTS

TABLE OF CONTENTS 2
1. PURPOSE OF THE PAIA MANUAL 3
2. LIST OF ACRONYMS AND ABBREVIATIONS 3
3. THE PROMOTION OF ACCESS TO INFORMATION ACT (THE ACT) 4
4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE 4
5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION 5
6. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS 5
7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION 6
8. RECORDS THAT ARE HELD BY THE OFFICES OF THE BUSINESS 7
9. PROCESSING OF PERSONAL INFORMATION 9
10. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES 12
11. INFORMATION REQUEST PROCEDURE 13
12. DENIAL OF ACCESS TO INFORMATION 13
13. PRESCRIBED FEES (SECTION 51(1)(F)) 14
14. DECISION 15
15. REMEDIES FOR REFUSAL OF A REQUEST 15
16. COMPLAINTS MANAGEMENT PROCESS AND PROCEDURE 15
17. AVAILABILITY AND UPDATING OF OUR MANUAL 16
18. APPENDICES 18

1. PURPOSE OF THE PAIA MANUAL

The Promotion of Access to Information Act 2 of 2000 ("PAIA" or "the Act") gives effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights. The Protection of Personal Information Act 2013 has amended the PAIA and also requires from private bodies to disclose certain information through the relevant organisation's PAIA Manual.

Specifically, section 51(1) of the Act, read with the Protection of Personal Information Act of 2013, requires a private body to compile a manual that must contain information as specified and required by both PAIA and POPI. In addition, the PAIA manual must set out the formal procedure that a person must follow in order to request to view, update or delete personal information held by the private body.

In this context, a "private body" is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g. any company, close corporation or business trust).

This organisation falls within the definition of a "private body" and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognises that access to information can be limited. In general, the limitations relate to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance.

Accordingly, this manual provides a reference to the records held and the process that needs to be adopted to access such records.

2. LIST OF ACRONYMS AND ABBREVIATIONS

NAME	DESCRIPTION
"CEO"	Chief Executive Officer
"DIO"	Deputy Information Officer
"FAIS Act"	Financial Advisory and Intermediary Services Act No. 37 of 2002
"FAIS Ombud"	Ombud for Financial Services Providers
"FSCA"	Financial Sector Conduct Authority
"IO"	Information Officer
"Minister"	Minister of Justice and Correctional Services
"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
"POPIA"	Protection of Personal Information Act No. 4 of 2013
"Regulator"	Information Regulator
"Republic"	Republic of South Africa
"The Act"	Promotion of Access to Information Act No. 2 of 2000 (as Amended)

All requests for access to information (other than information that is available to the public) must be addressed to the Chief Information Officer named in Section 4 of this Manual.

3. THE PROMOTION OF ACCESS TO INFORMATION ACT (THE ACT)

The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of the Act must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in regulations 6 and 7 of the Act.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights.

The Guide can also be obtained—

- Upon request to the Information Officer;
- from the website of the Regulator https://inforegulator.org.za

The contact details of the Regulator are:

General Enquiries: enquiries@inforegulator.org.za
PAIA complaints: PAIAComplaints@inforegulator.org.za
POPIA complaints: POPIAComplaints@inforegulator.org.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The aforesaid Guide contains the description of—

(a) the objects of PAIA and POPIA;
(b) the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
(c) the manner and form of a request for access to a record of a public body contemplated in section 11, and access to a record of a private body contemplated in section 50;
(d) the assistance available from the IO of a public body in terms of PAIA and POPIA;
(e) the assistance available from the Regulator in terms of PAIA and POPIA;
(f) all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, and an application with a court against a decision by the information officer;
(g) the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
(h) the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

(i) the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
(j) the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained—
(a) upon request to the Information Officer; and
(b) from the website of the Regulator (https://www.inforegulator.org.za/).

4.6 A copy of the Guide is available in the following official languages for public inspection during normal office hours: English and Afrikaans.

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

CHIEF INFORMATION OFFICER / INFORMATION OFFICER (IO)	
Name:	Roger Eskinazi
Position:	Key Individual
Physical Address:	34 Whitely Road, Melrose Arch, Johannesburg
Phone Number:	+27 872 500 143
Email Address:	roger@tickmill.com
Website:	https://www.tickmill.com/?redir=0&fsca=1

DEPUTY INFORMATION OFFICER (DIO)	
Name:	Roger Eskinazi
Position:	Key Individual
Physical Address:	34 Whitely Road, Melrose Arch, Johannesburg
Phone Number:	+27 872 500 143
Email Address:	roger@tickmill.com

ACCESS TO INFORMATION — GENERAL CONTACT DETAILS	
General Access Email:	support@tickmill.com
Postal Address:	34 Whitely Road, Melrose Arch, Johannesburg
Physical Address:	34 Whitely Road, Melrose Arch, Johannesburg
Telephone:	+27 872 500 143

6. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

In terms of section 52 of PAIA, Tickmill South Africa (Pty) Ltd makes the following categories of records automatically available to the public, without a person having to submit a formal PAIA request.

Category of Records	Types of the Record	Available on Website	Available upon Request
Company information	Complaints Policy and Procedure Conflict of Interest Policy and Register PAIA Manual Privacy Notice/Statement Terms and Conditions	✓	✓
Company information	Other policies		✓

Category of Records	Types of the Record	Available on Website	Available upon Request
Publications	Advertisements Information Documents Marketing Materials Newsletters Presentations Press Releases Social Media Videos Websites and Content	✓	✓

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

NOTE: There may not be specific records that mention us by name in the records of all or any of the institutions that administer the Acts mentioned below, but the following legislation is applicable to us:

Tickmill South Africa retains records and documents in terms of the legislation listed below.

Unless a disclosure is prohibited in terms of legislation, regulations, contractual agreement, or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties.

The records reflected in the table below are available in accordance with legislation:

Category of Records	**Applicable Legislation**
Company information	Companies Act 71 of 2008
Communications & Privacy	Electronic Communications Act 36 of 2005; Electronic Communications and Transactions Act 25 of 2002; Promotion of Access to Information Act 2 of 2000; Protection of Personal Information Act 4 of 2013
Competition information	Competition Act 89 of 1998
Intellectual Property	Copyright Act 98 of 1978
Employment information	Basic Conditions of Employment Act 75 of 1997; Broad-Based Black Economic Empowerment Act 53 of 2003; Employment Equity Act 55 of 1998; Labour Relations Act 66 of 1995; Skills Development Act 97 of 1998; Unemployment Insurance Act 63 of 2001
Exchange control information	Currency and Exchange Act 9 of 1933
Financial crime information	Financial Intelligence Centre Act 38 of 2001; Prevention and Combating of Corrupt Activities Act 12 of 2004; Prevention of Organised Crime Act 121 of 1998; Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
PAIA Manual; Information security information	Promotion of Access to Information Act 2 of 2000; Protection of Personal Information Act 4 of 2013
Complaint management	Financial Advisory and Intermediary Services Act 37 of 2002

Category of Records	Applicable Legislation
policy and procedure; Financial service provider information	
Financial institutions information	Financial Institutions (Protection of Funds) Act 28 of 2001; Financial Sector Regulation Act 9 of 2017
Financial markets information	Financial Markets Act 19 of 2012
Health information	The Occupational Health and Safety Act 85 of 1993
Legal information	Promotion of Administrative Justice Act 3 of 2000
HR Information	; Constitution of the Republic of South Africa (as amended); Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
Operational & Client Information;	Consumer Protection Act 68 of 2008;
Tax information	Income Tax Act 58 of 1962; Value Added Tax Act 89 of 1991; Skills Development Levy Act 9 of 1999; Tax Administration Act 28 of 2011; Unemployment

8. RECORDS THAT ARE HELD BY THE OFFICES OF THE BUSINESS

The records reflected in the table below may be formally requested in terms of PAIA, but parts or the whole record may be subject to the grounds for refusal of access to records.

SUBJECT / FUNCTION	CATEGORIES OF RECORDS
Operations	Brochures and Company Information; Client and Customer Registry; Contracts; General Correspondence; Information relating to Work-In-Progress; Marketing material and Future Strategies; Policies and Procedures
Company records	Incorporation Documents Memorandum of Incorporation Minutes and Resolutions Registers of Directors and Officers Share Registers and Other Statutory Registers Statutory Returns to Relevant Authorities Records Relating to the Appointment of Directors, Auditors, Company Secretary, Public Officer and Other Officers
Financial Records	Accounting Records; Annual Financial Statements; Asset Register; Banking Records; Contracts; Financial Transactions; General Correspondence; Insurance Information; Management Accounts; Tax Records (Company and Employee)
Insurance records	Claims Details of insurance coverage, limits and insurers Insurance policies
Tax records	Dividends Withholding Tax Income Tax Pay As You Earn (PAYE)

SUBJECT / FUNCTION	CATEGORIES OF RECORDS
	Skills Development Levy (SDL) Unemployment Insurance Fund (UIF) Value Added Tax (VAT)
Legal records	Documents related to litigation and/or arbitration General agreements and contracts Licences, permits and authorisations Regulatory correspondence
Information Technology	IT policies and Procedures; Asset issuance and custodian information; Backup; Disaster recovery testing; Incidents and service requests; Network maintenance; Operational reports; Service level agreements; System event logs
Special information processed	Offences / alleged offences; Criminal proceedings, outcomes & sentences
Employee records	Arbitration Awards; Attendance Registers; CCMA Proceedings; Code of Conduct; Income Tax (PAYE/SDL/UIF) Filings; Confidentiality Agreements; Disciplinary Proceedings; Employee Personal Details; Conditions of Employment and Policies; Employment Contracts; Employment Equity Plan; Leave; Training Schedules and Materials; Verification Reports (Credit, Criminal, Employment, FAIS, Identity, Qualification)
Client records	Client agreements/contracts and forms Complaints and/or inquiries Client documents and information Suggestions Transactions and supporting information Verification reports
Service provider and third-party records	Conflicts of interest Requests for information Service provider and/or third party agreements/contracts (including service level agreements) Tenders Terms and conditions for dealing with suppliers Transactions and supporting information
Possible Recipients of Personal Information	Banks and other financial institutions; Ombudsman and regulatory authorities; Regulatory, statutory and government bodies; Third party verification agencies and credit bureau; Tickmill Ltd (Seychelles), the product supplier to which the Company introduces clients
Publications	Advertisements; Information Documents; Marketing Materials; Newsletters; Presentations; Press Releases; Social Media; Videos; Websites and Content

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Natural Persons Clients/customers/financial planners; Representatives/Agents; Contractors; prospective clients introduced to Tickmill Ltd	Names; Physical and postal addresses; Date of birth; ID number; Tax related information; Nationality; Gender; Confidential correspondence; Email address; Telephone number
Service Providers	Names; Registration number; VAT numbers; Address; Bank details

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Employees(Existing and former employees; Contractors, agents, temporary and casual employees)	Name; Address; Qualifications; Registration numbers or identity numbers; Bank details; Tax related information; Nationality; Confidential correspondence; Email address; Contact telephone numbers
Shareholders & Directors	Names; Identity numbers; Physical and email addresses; Tax numbers; Shareholding percentages; FICA/KYC verification documentation; FIT & Proper status records

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

The Company processes the personal information of data subjects in the following ways:

9.1.1 Execution and/or compliance with its statutory obligations under PAIA and/or POPIA;
9.1.2 Execution and/or compliance with its statutory obligations under other applicable legislation;
9.1.3 Execution and/or compliance with its contractual obligations;
9.1.4 Administration of employees and potential employees;
9.1.5 Keeping of accounts and records;
9.1.6 Procurement processes;
9.1.7 Obtaining information necessary to provide contractually agreed services to customers and clients;
9.1.8 Resolving and tracking complaints;
9.1.9 Staff administration;
9.1.10 Verifying information provided to us;
9.1.11 Visitors to the Company's business premises.
9.1.12 Introducing prospective clients to Tickmill Ltd, an associate of the Company, and transferring their personal information to Tickmill Ltd so that it can consider and administer their applications;
9.1.13 Receiving and processing information from Tickmill Ltd about the trading activity of introduced clients, in order to calculate and reconcile the Company's remuneration, deal with complaints and comply with the Company's obligations under the Financial Intelligence Centre Act 38 of 2001.

9.2 Description of the Categories of Data Subjects and of the information or categories of information relating thereto

The Company may process information for itself, shareholders, employees, customers, service providers and product suppliers.

Categories of Data Subjects	Personal Information that may be processed
Customers (and those of customers); Service providers and product suppliers (and those of customers)	Full names; contact details (contact numbers, fax numbers, email addresses); physical addresses; postal addresses; unique identifier; identity/registration numbers; confidential correspondence; tax-related information; company information; information required in terms of the FAIS Act and the FICA (and other relevant legislation)
Employees/Key Individuals/Representatives (and those of customers)	Full names of contact persons; registered and trading names of entities; full names of directors and shareholders; physical addresses; postal addresses; contact details (contact numbers, fax numbers, email addresses); financial information; identity/passport/registration numbers; incorporation documents; tax-related information; authorised

Categories of Data Subjects	Personal Information that may be processed
	signatories' information; broad-based black economic empowerment (B-BBEE) status; associated entities; business strategies; information required in terms of the FAIS Act and the FICA Act (and other relevant information)

9.3 The recipients or categories of recipients to whom the personal information may be supplied

9.3.1 The Company may provide the personal information of data subjects to service providers, who provide the following services:

(a) Administration (for example, clients, investments, medical funds, retirement funds);
(b) Accounting and/or auditing;
(c) Capture and organisation of personal information;
(d) Compliance;
(e) Due diligence reviews;
(f) Information and communication technology (ICT);
(g) Retention of personal information; and
(h) Verification checks (for example, credit (and payment history), criminal, employment history, FAIS-related, financial sanctions, identity, qualifications, terrorism).

9.3.2 The Company may provide the personal information of data subjects to:

(a) Courts, in terms of matters that are being taken up for judicial review;
(b) Enforcement agencies, for criminal investigation (for example, National Prosecuting Authority, South African Police Service);
(c) People against whom complaints have been lodged; and
(d) Regulators, ombudsmen or tribunals, in terms of matters that fall within their jurisdiction.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity/passport/registration numbers, dates of birth, dates of incorporation, names	Companies and Intellectual Property Commission (CIPC), Department of Home Affairs, Financial Intelligence Centre, South African Police Services, United Nations, and verification providers
Qualifications	South African Qualifications Authority and verification providers
Credit and payment history	Credit Bureaus and verification providers
Tax information	South African Revenue Service

9.3.3 The Company may disclose Personal Information to Tickmill Group companies, subject in each case to the clause regarding cross-border transfers, only where necessary for the following purposes:
(a) client servicing, support and onboarding, where necessary for the conclusion or performance of a contract with the data subject (section 11(1)(b) of POPIA);
(b) risk management, financial audit, internal controls and group governance, in pursuit of the legitimate interests of the Company and the Tickmill Group (section 11(1)(f)), against which the data subject may object under section 11(3);
(c) anti-money laundering, counter-terrorist financing, proliferation financing and sanctions screening, where required for compliance with a legal obligation, including the Financial Intelligence Centre Act 38 of 2001 and any group-wide programme contemplated in section 42B thereof (section

11(1)(c)). Where such screening is automated, no decision with legal effect will be taken solely on the automated outcome without human review, in accordance with section 71 of POPIA; and
(d) shared information technology, software support and hosting services, in which case the relevant group company acts as an operator under sections 20 and 21 of POPIA pursuant to a written agreement imposing confidentiality and security obligations no less protective than section 19.
9.3.4 Introduced clients. The Company introduces prospective clients to Tickmill Ltd, a company incorporated in Seychelles and regulated by the Seychelles Financial Services Authority (licence number SD008), in terms of a Business Introducer Agreement. To make an introduction, the Company transfers to Tickmill Ltd the prospective client's name, contact details and any other information the client has provided to the Company. Tickmill Ltd processes this information, and the information it collects directly from the client, as a responsible party in its own right in order to open, administer and service the client's account and to comply with its own legal obligations. Tickmill Ltd does not act as the Company's operator for this purpose. Tickmill Ltd provides the Company with information about the trading activity of introduced clients for the purposes set out in clause 9.1.13.

9.4 Planned transborder flows of personal information

9.4.1 Cross-Border Transfers. The Company uses global information technology infrastructure, cloud hosting and service providers, and forms part of an international group. Personal information may accordingly be transferred to, stored or processed in jurisdictions outside the Republic of South Africa for the purposes described in this Policy.

9.4.2 The Company will not transfer personal information to a third party in a foreign country unless one of the following grounds in section 72(1) of POPIA applies:

(a) the recipient is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection that effectively upholds principles for reasonable processing substantially similar to the conditions in POPIA, *and* which includes provisions substantially similar to section 72 restricting the further transfer of personal information from the recipient to third parties in other foreign countries;

(b) the data subject consents to the transfer;

(c) the transfer is necessary for the performance of a contract between the data subject and the Company, or for the implementation of pre-contractual measures taken in response to the data subject's request;

(d) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the Company and a third party; or

(e) the transfer is for the benefit of the data subject, it is not reasonably practicable to obtain the data subject's consent, and, if it were reasonably practicable, the data subject would be likely to give it.

9.4.3 Intra-group transfers are made under [binding corporate rules / a binding intra-group data transfer agreement] satisfying clause 9.4.2(a). Transfers to external service providers acting as operators are governed by written agreements complying with sections 20 and 21 of POPIA and imposing security safeguards no less protective than section 19, together with a ground under clause 9.4.2.
9.4.4 Transfers to Tickmill Ltd in Seychelles. The personal information of introduced clients is transferred to Tickmill Ltd in Seychelles. The Company makes these transfers on the following grounds in section 72(1) of POPIA: (a) a binding data transfer agreement between the Company and Tickmill Ltd that satisfies clause 9.4.2(a) the consent of the data subject, obtained when the introduction is made (clause 9.4.2(b)). Before any personal information is transferred, the Company informs the prospective client that the information will be transferred to Tickmill Ltd in Seychelles, of

the purpose of the transfer, and that Tickmill Ltd's own privacy policy will govern its further processing.

9.5 Categories of Data Subjects

- Clients and client's employees, representatives, agents, contractors and service providers
- Prospective clients introduced to Tickmill Ltd, and second-tier introducers
- Existing and former employees (including contractors, agents, temporary and casual employees)
- Our stakeholders

10. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES

Up to date technology is employed to ensure the confidentiality, integrity and availability of the Personal Information under our care.

Measures include:

- Acceptable usage of personal information
- Access control to personal information
- Agreements with operators to ensure that they implement and maintain appropriate security controls
- Antivirus software
- Anti-malware software
- Computer and network security including Firewalls, Virus protection software and update protocols
- Data backup
- Data encryption
- Defensive measures
- Governance and regulatory compliance
- Internal process to report security breach or anticipated security breach
- Investigating and reacting to security incidents
- Logical and physical access control
- Monitoring access and usage of private information
- Physical security
- Retention and disposal of information
- Secure communications
- Security in the outsourcing of any activities or functions through appropriate contracts
- Training of staff members
- User awareness and vigilance

We continuously establish and maintain appropriate, reasonable technical and organizational measures to ensure that the integrity of the Personal Information which may be in our possession or under our control, is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access.

The following operational measures are in place to ensure that the Company (in terms of POPIA section 19):

(a) Identifies the risks (both internal and external) to the personal information in its possession and/or under its control;
(b) Establishes and maintains appropriate safeguards against the identified risks;
(c) Regularly verifies that the safeguards are being effectively implemented; and
(d) Updates the safeguards when new risks are identified, and when existing safeguards are found to be deficient.

11. INFORMATION REQUEST PROCEDURE

The requester must use the prescribed form/s to make the request for access to a record. The prescribed forms are attached to this document as:

- Form 02: Request for Access to Record [Regulation 7] — Public & Private Bodies.
- Form 03: Outcome of request and of fees payable [Regulation 8] — Public & Private Bodies.

These forms are also available from the Chief Information Officer named in Section 5 above. Alternatively, they are available from the website of the Information Regulator at https://inforegulator.org.za/popia-forms/

The request must be made to the Chief Information Officer named in Section 5 above. Records held by Tickmill South Africa may be accessed by request only once the prerequisite requirements for access have been met.

A requester is any person requesting access to information. There are two types of requesters:

Personal Requester

A personal requester is a requester who is seeking access to information containing personal information about the requester. Tickmill South Africa will voluntarily provide the requested information or give access to any record concerning the requester's personal information. The prescribed fee for the reproduction of the information requested will be charged (if applicable).

Other Requester

This requester is entitled to request access to information on third parties. In considering such a request, the Information Officer will take all reasonable steps to inform the third party to whom the requested record relates of the request.

The requester must fulfil the prerequisite requirements, including the payment of a request and access fee.

- The requester must provide sufficient detail on the request form to enable the Chief Information Officer to identify the record and the requester.
- The requester must identify the right that is sought to be exercised or to be protected and must provide an explanation of why the requested record is required.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request.
- The prescribed request fee must be attached.
- We will respond to your request within 30 days of receiving the request.

12. DENIAL OF ACCESS TO INFORMATION

12.1 Tickmill South Africa is entitled to refuse a request for information in terms of the Act.
12.2 Access to information may be subject to the grounds of refusal.
12.3 Amongst others, records deemed confidential on the part of a third party, will require permission from the third party concerned, in addition to normal requirements, before the granting of access may be considered.

12.4 The main grounds for Tickmill South Africa to refuse a request for information are:

(a) Mandatory prohibition on the processing of special personal information (section 26 of POPIA);
(b) Mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person;
(c) Mandatory protection of personal information in compliance with POPIA;
(d) Mandatory protection of the commercial information of a third party (section 64);
(e) Mandatory protection of confidential information of third parties (section 65);
(f) Mandatory protection of the safety of individuals and the protection of property (section 66);
(g) Mandatory protection of records privileged in legal proceedings (section 67).

12.5 Public Interest Override

The Information Officer or Deputy Information Officer may grant access to a record if disclosure of the record would reveal evidence of a material breach of, or failure to comply with, any law, and the public interest in disclosure of the record outweighs the harm envisaged in the relevant grounds for refusal of access to the records.

12.6 Requests for information that are frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

12.7 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

12.8 If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record.

12.9 If access to a record or any other relevant information is denied, our response will include:
- Adequate reasons for the refusal; and
- Notice that you may lodge an application with the court against the refusal.

13. PRESCRIBED FEES (SECTION 51(1)(F))

13.1 The Act provides for two types of fees: (a) a request fee (non-refundable administration fee); and (b) an access fee (payable where access is granted).

13.2 Where a requester submits a request for access to information about a person other than the requester, a request fee of R50.00 is payable upfront.

Fee Schedule:

Fee type	Description	Fee
Request fee	Payable by every requester *other than a personal requester*	R140.00
Access fees	Photocopy or printed B&W A4 page (or part thereof)	R2.00 per page
	Copy on flash drive (provided by requester)	R40.00
	Copy on CD — provided by requester / provided by body	R40.00 / R60.00
	Transcription of visual images, per A4 page	Outsourced — per service provider quotation
	Copy of visual images	Outsourced — per service provider quotation
	Transcription of audio record, per A4 page	R24.00
	Copy of audio record — flash drive / CD (requester) / CD (body)	R40.00 / R40.00 / R60.00

Fee type	Description	Fee
	Search and preparation, per hour or part thereof (excluding first hour), **capped at R435.00 in total**	R145.00
Deposit	Where search and preparation will exceed 6 hours	One-third of the estimated access fee
Postage	Where a copy must be posted	Actual expense

14. DECISION

14.1 Tickmill South Africa will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give written notice with reasons to that effect.

14.2 The 30-day period may be extended for a further period of not more than 30 days if the request is for a large amount of information, or the request requires a search for information held at another location.

14.3 Tickmill South Africa will notify the requester in writing should an extension be sought.

15. REMEDIES FOR REFUSAL OF A REQUEST

15.1 Internal Remedies

Tickmill South Africa does not have internal appeal procedures as the decision made by the Information Officer is legally final. A requester will need to exercise external remedies should the request for information be refused.

15.2 External Remedies

(a) A requestor and/or third party that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of receipt of notification of the decision apply to the High Court with jurisdiction, for relief.

(b) A requestor may also lodge a complaint with the Information Regulator in terms of section 78A of PAIA, where the requestor is dissatisfied with the Information Officer's decision or where no response has been received within the prescribed period:

INFORMATION REGULATOR — PAIA COMPLAINTS
Email: PAIAComplaints@inforegulator.org.za
General Enquiries: enquiries@inforegulator.org.za
Website: https://www.inforegulator.org.za

16. COMPLAINTS MANAGEMENT PROCESS AND PROCEDURE

16.1 Obligation to Maintain a Complaints Management Policy

In terms of the Financial Advisory and Intermediary Services Act 37 of 2002 ("FAIS Act") and the Financial Sector Conduct Authority (FSCA) Conduct Standard 3 of 2020, Tickmill South Africa (Pty) Ltd, as a licensed Financial Services Provider (FSP No: 49464), is required to maintain, implement and make available a complaints management policy and procedure.

16.2 Records Relating to Complaints Management

Records relating to complaints management are available in accordance with the FAIS Act 37 of 2002 and include:

(a) the Complaints Policy and Procedure;
(b) the Complaints Register (records of complaints received, investigated and resolved);

(c) correspondence and supporting documentation relating to complaints; and
(d) records of outcomes and remedial actions arising from complaints.

16.3 Availability of the Complaints Policy and Procedure

The Complaints Policy and Procedure is available—

(a) on the Company's website at https://www.tickmill.com;
(b) at the head office of Tickmill South Africa (Pty) Ltd for public inspection during normal business hours; and
(c) upon request to the Chief Information Officer named in Section 5 of this Manual.

16.4 How to Submit a Complaint

Complaints relating to financial services rendered by Tickmill South Africa (Pty) Ltd may be submitted—

(a) directly to the Chief Information Officer / Compliance Officer at the contact details set out in Section 5 of this Manual;
(b) to the FAIS Ombud, should the complaint remain unresolved after following the internal complaints process:

FAIS OMBUD — OMBUD FOR FINANCIAL SERVICES PROVIDERS
Postal Address: PO Box 74571, Lynwood Ridge, 0040
Physical Address: Kasteel Park Office Park, Orange Building, 2nd Floor, 546 Jochemus Street, Erasmuskloof, Pretoria, 0048
Telephone: 012 762 5000
Toll-free: 0800 110 443
Email: info@faisombud.co.za
Website: www.faisombud.co.za

(c) to the Financial Sector Conduct Authority ("FSCA"), in respect of matters within the FSCA's jurisdiction:

FINANCIAL SECTOR CONDUCT AUTHORITY (FSCA)
Telephone: 0800 20 37 22 (toll-free)
Email: info@fsca.co.za
Website: www.fsca.co.za

16.5 Client Records — Complaints

The following categories of client records relating to complaints are held by Tickmill South Africa and may be requested in terms of PAIA:

Category of Record	Types of Records
Client records — complaints	Client agreements/contracts and forms Complaints and/or inquiries Client documents and information Transactions and supporting information Verification reports

17. AVAILABILITY AND UPDATING OF OUR MANUAL

A copy of the Manual is available—

(a) on the website at https://www.tickmill.com/?redir=0&fsca=1;
(b) at the head office of Tickmill South Africa (Pty) Ltd for public inspection during normal business hours;
(c) to any person upon request and upon the payment of a reasonable prescribed fee; and

(d) to the Information Regulator upon request.

Any transmission costs or postage required in respect of hard copies of the Manual will be for the account of the requester.

The head of Tickmill South Africa (Pty) Ltd will on a regular basis update this Manual. The Manual will be reviewed at least annually or whenever there is a material change in applicable legislation or the Company's information processing activities.

18. APPENDICES

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

_____
_____
_____
_____

(Address)

E-mail address: _____

Fax number: _____

*Mark with an **"X"***

☐Request is made in my own name ☐Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made *(when made on behalf of another person)*				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	**Tel. (B):**		**Facsimile:**	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				

PERSONAL INFORMATION				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	**Tel. (B)**		**Facsimile**	
	Cellular			

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particularsof record	

TYPE OF RECORD

*(Mark the applicable box with an "**X**")*

Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	

Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS *(Mark the applicable box with an "**X**")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(Note that if the record is not available in the language you prefer, access may be granted inthe language in which the record is available)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or	

protected	
Explain why the record requested is required forthe exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.* *d) If you qualify for exemption of the payment of any fee, please state the reason for exemption*	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	**Facsimile**	**Electronic communication** ***(Please specify)***

Signed at_____this_____day of_____20 _____

_____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name and Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

_____

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

1. *If your request is granted the—*
   (a) *amount of the deposit, (if any), is payable before your request is processed; and*
   (b) *requested record/portion of the record will only be released once proof of full payment is received.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____
_____
_____
_____

Your request dated_____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	

OR

2. You requested:

Printed copies of the information *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of information on flash drive *(including virtual images and soundtracks)*	
Copy of information on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language: *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60. 00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐Yes ☐No

Hours of search		Amount of deposit *(calculated on one third of total amount per request)*	

The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at_____this_____day of_____20 _____

_____

Information Officer